## Remarks

Applicant has carefully considered the Office Action dated August 9, 2004 and the references cited therein. Applicant respectfully requests reexamination and reconsideration of the application.

Claims 1, 3-16 and 18-20 remain rejected under 35 USC §102(e) as being anticipated by United States Patent 5,050091, Rubin, already of record. Prior to addressing the rejection set forth by the examiner, applicant respectfully request that the examiner consider the following. The present invention addresses the need for translating a design technology, as expressed in one or more design rules, into an intermediate format such as the text format of the illustrative embodiment of the subject invention. Software tools that utilize physical design rules can then use the intermediate format entities, mainly variables in SKILL format. With this layer of intermediate entities, the software tools does not work based on the hard coded numbers, but instead, work based on the value of the intermediate entities, for example a variable or a programmable cell driven by the intermediate entities. As such, the inventive system does not actively drive a design, but passively reflects the physical design aspects, such as metal spacing and metal width, to allow other programs that require different data formats to reference the same information.

Conversely, the Rubin reference, upon which the examiner's rejections are based, shows a system which can be used to actively define the relationships among design elements within a circuit. Note, although Rubin mentions verification of the design, there does not appear to be any actual disclosure as to how such verification occurs.

Claims 1 has been amended to include some of the limitations of claim 6 and specifically recites a method for ensuring consistency of design rule application among a plurality of CAD tool programs including "creating a global design rule definition file in text format, the global design rule definition file including at least one global variable having a design rule characteristic assigned thereto" and "redefining the a text value of the global variable in the global design rule definition file in accordance with modifications to the design rule and conforming the CAD tool program to modifications

6

in the design rule" (claim 1, lines 4-5and 10-12). In the Rubin, there does not appear to be a global design rule definition file *in text format*. In fact, the only mention of textual design languages in Rubin, is in the Background of the Invention section in which it is pointed out that such systems are less desirable than graphic design languages which are easier to learn and faster to use in producing a circuit. ( Rubin, col. 1, lines 49-68). Accordingly, applicant respectfully asserts that Rubin actually teaches away from the subject matter of the claim invention, as recited by amended claim 1.

In addition, in setting forth rejection of claim 6 in the most recent office, the examiner has alleged that Rubin discloses a global design rule definition file in a text format, citing the attributes mentioned in Rubin (Rubin, column 15, lines 20-25). Applicants respectfully traverse such reasoning as a basis for the rejection. Specifically, the section of Rubin cited by the examiner describes a database consisting of objects each having attributes. The nodes in a circuit design may have several attributes or properties, including a name location and list of connections to the node. There is no mention of any of number attributes stored or defined in text format. Conversely, the section of Rubin cited by the examiner specifically indicates that a Prolog interpreter 35 operates under control of user interface 20 to provide interpretation of the *Prolog programming* language to allow execution of program commands as they are entered. The examiner can appreciate the difference between a global design rule file in which the variables are recited in *text format*, versus one in which they are recited in a proprietary programming language, such as Prolog. With design rule variables in text format, the variables may be easily adapted by a variety of software tools which have different data format requirements. Conversely, a global design rule file in which the variables are defined in a proprietary language, such as Prolog, is accessible and usable only by the software tools which understand the language or which contain facilities for conversion from the proprietary language to either a native format or a format that the tool understands. Accordingly, claim 1 is believed not anticipated by nor made obvious in light of Rubin for at least the reasons set forth above. Claim 6 has been amended to partially delete the limitations recited therein. Claims 3-7, include all the limitations of claim 1 and are likewise believed allowable for at least the same reasons as claim 1, as well as for the merits of their own respective limitations.

7

Claims 8 has been amended to include limitations similar to claim 1. Specifically, claim 8 recites a computer-aided design system comprising "a global design rule definition file <u>in text format, the global design rule definition file</u> stored in the memory and including at least one global variable having a design rule characteristic assigned thereto" (claim 8, lines 5-6) A global design rule file in text format is more versatile than one in which the variables are defined in the proprietary or native format of a specific software tool or tool environment.. Accordingly, claim 8 is believed not anticipated by nor made obvious in light of Rubin for at least the reasons set forth in claim 1, as well as for the merits of its own respective limitations. Claim 12 has been amended to partially delete the limitations recited therein. Claims 9-13, include all the limitations of claim 8 and are likewise believed allowable for at least the same reasons, as well as for the merits of their own respective limitations.

Claim 14 has been amended to include limitations similar to claims 1 and 8. Specifically, claim 14 recites a computer program product comprising "program code for defining a global design rule definition file <u>in text format, the global design rule definition file having</u> at least one global variable having a design rule characteristic assigned thereto" and "program code for redefining ~~the~~ <u>a text</u> value of the global variable in the CAD tool program in accordance with modifications to the design rule characteristic assigned to the global variable in the global design rule definition file" (claim 14, lines 5-7 and 13-16). Again, a global design rule file in text format is more versatile than one in which the variables are defined in the proprietary or native format of a specific software tool or tool environment. Accordingly, claim 14 is believed not anticipated by Rubin for at least the same reasons as claims 1 and 8, as well as for the merits of its own respective limitations.

Claim 15 has been canceled, without prejudice.

Claim 16 has been amended to include limitations similar to claims1, 8 and 14. Specifically, claim 16 has now been amended to recite a method for ensuring consistency of design rule application among a plurality of CAD tool programs including "creating a global design rule definition file <u>in text format</u> in the memory, the global design rule definition file including at least one global variable having a design rule characteristic assigned thereto" and "redefining <u>a text</u> value of the global variable in the

8

global design rule definition file in accordance with modifications to the design rule characteristic and conforming the CAD tool program to modifications in the design rule characteristic"(claim 16, lines 5-7 and 10-12). Accordingly, claim 16 is believed not anticipated by Rubin for at least the same reasons as claims 1, 8 and 14, as well as for the merits of its own respective limitations.

Claims 18 - 20 have been amended to include a new limitations similar to claims 1, 8, 14, and 16. (Claim 18, line 2; claim 19, line 2; claim 20, line 2). Accordingly, claims 18-20 are similarly believed not anticipated by Rubin for at least the same reasons as claim 1, 8, 14 and 16, as well as for the merits of their own respective limitations.

Applicant respectfully reasserts any other remarks and traversals set forth in prior responses to the extent still relevant to the outstanding rejections.

The amendments to the claims as set forth herein, including the addition or cancellation of any claims, have been offered to advance this application to issue. None of the amendments made herein should be construed as an admission that the subject matter of the claims, as originally filed, is anticipated by or made obvious in light of any art of record whether considered singularly or in combinations. Applicant expressly reserves the right to pursue the originally filed claims in another co-pending application without being prejudiced by any amendments, including cancellation of claims, made herein.

If after considering the above remarks and amendments, the Examiner is still not of the opinion that allowable subject matter is claimed, Applicants respectfully request a telephone interview with the Examiner and his/her respective Supervisory Patent Examiner to resolve any outstanding issues prior to issuance of any further office actions.

Applicant believes the claims are in allowable condition. A notice of allowance for this application is solicited earnestly. If the Examiner has any further questions regarding this amendment, he/she is invited to call Applicant's attorney at the number listed below. The Examiner is hereby authorized to charge any fees or credit any balances under 37 CFR §1.17, and 1.16 to Deposit Account No. 02-3038.

Respectfully submitted,

Bruce D. Jobse, Esq.  Reg. No. 33,518
KUDIRKA & JOBSE, LLP
Customer Number 021127
Tel: (617) 367-4600  Fax: (617) 367-4656

Date: 10/14/04